

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNILOC 2017 LLC, UNILOC USA, INC. and	§	
UNILOC LUXEMBOURG S.A.,	§	Case No. 2:18-cv-00042-JRG-RSP
Plaintiffs,	§	
	§	
v.	§	
	§	
SAMSUNG ELECTRONICS AMERICA, INC.	§	
and SAMSUNG ELECTRONICS CO. LTD.,	§	
Defendants.	§	

**JOINT MOTION AND STIPULATION OF DISMISSAL
PURSUANT TO RULE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs Uniloc 2017 LLC, Uniloc USA, Inc. and Uniloc Luxembourg S.A. (“Uniloc”) and Defendants Samsung Electronics America, Inc. and Samsung Electronics Co. Ltd. (“Samsung”) jointly move and stipulate to a dismissal and final judgment in this action on the following terms:

- 1) Plaintiffs (collectively, “Uniloc”) dismisses with prejudice all claims of infringement against defendants (collectively, “Samsung”), except as to claim 18.
- 2) As the Court has found claim 18 invalid, Uniloc agrees to entry of a final judgment with prejudice, to facilitate an appeal.
- 3) Samsung agrees to a dismissal without prejudice of its counterclaims.

Date: May 30, 2019

Respectfully submitted,

<p><i>/s/ Kevin Gannon</i></p> <p>Paul J. Hayes Massachusetts State Bar No. 227000 Kevin Gannon Massachusetts State Bar No. 640931 PRINCE LOBEL TYE LLP One International Place, Suite 3700 Boston, MA 02110 Tel: (617) 456-8000 Fax: (617) 456-8100 Email: phayes@princelobel.com Email: kgannon@princelobel.com</p> <p>Edward R. Nelson III ed@nbafirm.com Texas State Bar No. 00797142 NELSON BUMGARDNER ALBRITTON P.C. 3131 West 7th Street, Suite 300 Fort Worth, TX 76107 Tel: (817) 377-9111</p> <p>Shawn Latchford shawn@nbafirm.com Texas State Bar No. 24066603 NELSON BUMGARDNER ALBRITTON P.C. 111 West Tyler Street Longview, Texas 75601 Tel: (903) 757-8449 Fax: (903) 758-7397</p> <p>ATTORNEYS FOR THE PLAINTIFFS</p>	<p><i>/s/ Allan A. Kassenoff</i></p> <p>Melissa R. Smith Bar No. 24001351 GILLAM & SMITH LLP 303 South Washington Avenue Marshall, Texas 75670 Telephone: (903) 934-8450 Facsimile: (903) 934-9257 Email: melissa@gillamsmithlaw.com</p> <p>Richard Edlin Allan A. Kassenoff GREENBERG TRAURIG, LLP MetLife Building, 200 Park Avenue New York, NY 10002 Telephone: (212) 801-9200 Facsimile: (212) 801-6400 Email: edlinr@gtlaw.com Email: kassenoffa@gtlaw.com</p> <p>Attorneys for Defendants Samsung Electronics America, Inc. and Samsung Electronics Co. Ltd.</p> <p>ATTORNEYS FOR THE DEFENDANTS</p>
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on May 30, 2019.

/s/ Kevin Gannon